: NOTICE OF MOTION FOR : ADMISSION PRO HAC VICE

| EASTERN DISTRICT OF N | IEW YORK | V |
|------------------------|-------------|---|
| LEELA ABRAHAM, et al., | | ; ; |
| | Plaintiffs, | : : : C.A. No. :12-cv-04686-WFK-JMA |

AMERICAN HOME MORTGAGE SERVICING, INC., et al.,

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Defendants.

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v.

To: Geoffrey R. Broderick

The Resolution Law Group, P.C. 500 West Putnam Avenue, Suite 400

Greenwich, CT 06830 Telephone: 203-349-8483 Facsimile: 855-228-1337

E-mail: geoffrey@theresolutionlawgroup.com

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate of Good Standing annexed thereto, I, John C. Blessington, hereby move this Court, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Court for the Eastern District of New York, for an Order allowing me admission *pro hac vice* to appear as counsel for Defendant Sovereign Bank, N.A. in the above-captioned action.

I am a member in good standing of the Bar of the Commonwealth of Massachusetts and there are no pending disciplinary proceedings against me in any state or <u>federal</u> court.

Dated: January 8, 2013

TOUR C. BLESS NGTON

K&L Gates LLP

State Street Financial Center

One Lincoln Street Boston, MA 02111

Telephone: 617.261.3100 Facsimile: 617.261.3175

E-mail: john.blessington@klgates.com

IDITED OF ATEC DICTRICT COURT

| EASTERN DISTRICT OF NEW YO | RK | v |
|---|-------|--|
| LEELA ABRAHAM, et al., Plaintif | | : : : : C.A. No. :12-cv-04686-WFK-JMA |
| v. AMERICAN HOME MORTGAGE SERVICING, INC., et al., | | : AFFIDAVIT OF JOHN C. : BLESSINGTON IN SUPPORT OF : MOTION FOR ADMISSION PRO HAC : VICE |
| Defend | ants. | : : : |
| Commonwealth of Massachusetts |) | X |
| Suffolk, ss |) | |

JOHN C. BLESSINGTON, being duly sworn, hereby deposes and says as follows:

- 1. I am a member of the firm of K&L Gates LLP, located at State Street Financial Center, One Lincoln Street, Boston, MA 02111. K&L Gates LLP represents defendant Sovereign Bank, N.A. in this action.
- 2. I submit this Affidavit in support of the Motion pursuant to Rule 1.3(c) of the Court's Local Civil Rules for an order permitting me to appear as counsel *pro hac vice* on behalf of Sovereign Bank, N.A. in this action.
- 3. I am currently a member in good standing of the Bar of the Commonwealth of Massachusetts. Attached hereto is the Certificate of Admission and Good Standing from the Commonwealth of Massachusetts issued within the past thirty days and reflecting my standing.
- 4. There are no pending disciplinary proceedings against me in any state or federal court.

5. Wherefore I respectfully submit that I be permitted to appear as counsel and advocate *pro hac vice* in this action for defendants Sovereign Bank, N.A.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: January 8, 2013 Boston, MA

OHN C. BLESSINGTON

K&L Gates LLP

State Street Financial Center

One Lincoln Street Boston, MA 02111

Telephone: 617.261.3100 Facsimile: 617.261.3175

E-mail: john.blessington@klgates.com

Sworn to before me this

 3^{α} day of January, 2013

Notary Public

STANLEY V. RAGALEVSKY, NOTARY PUBLIC MY COMMISSION EXPIRES MARCH 25, 2016

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the tenth

day of June A.D. 1987, said Court being the highest

Court of Record in said Commonwealth:

John C. Blessington

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **eleventh** day of **December**

in the year of our Lord two thousand and twelve.



^{*} Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

X3116

| UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK | V |
|--|---|
| LEELA ABRAHAM, et al., | ; ; ; |
| Plaintiffs, v. AMERICAN HOME MORTGAGE SERVICING, INC., et al., Defendants. | : C.A. No. 1:12-cv-04686-WFK-JMA : ORDER FOR : ADMISSION PRO HAC VICE : |
| The motion of John C. Blessington, for | admission to practice pro hac vice in the above |
| captioned action is granted. The admitted atto | rney, John C. Blessington, is permitted to argue or |
| try this particular case in whole or in part as co | ounsel or advocate for defendant Sovereign Bank, |
| N.A. | |
| TT1 : 0 1 1 20 1 | |

This Order becomes effective upon the Court's receipt of the required \$25.00 attorney admission fee and confirms your appearance as counsel in this case. A notation of your admission *pro hac vice* in the above listed case will be made on the roll of attorneys.

| Dated: New York, New York | |
|---------------------------|------------------------------|
| , 2013 | |
| | United States District Judge |

CERTIFICATE OF SERVICE

The undersigned certifies this 2 day of January, 2013 that a true and correct copy of the foregoing Notice of Motion for Admission *pro hac vice*, was served by way of the Court's ECF system upon all counsel of record.